

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

NICHOLAS BLOOM,

Defendant.

24-CR-104-RJA-HKS

NOTICE UNDER RULE 12.2

JEFFREY T. BAGLEY, affirms under penalty of perjury that:

1. I am an attorney with the Federal Public Defender's Office located at 300 Pearl Street, Suite 200, Buffalo, New York 14202, and I represent the defendant, Nicholas Bloom, in the instant matter.
2. On the government's motion and without objection this Court ordered a competency evaluation under 18 U.S.C. § 4241. The parties were notified that Mr. Bloom arrived at Los Angeles Metropolitan Detention Center on September 4, 2024, for the purposes of the evaluation.
3. Now, Pursuant to Rule 12.2(a) of the Federal Rules of Criminal Procedure, the defense hereby notifies the government of its intention to assert a defense of insanity at the time of the alleged offense. Upon information and belief, the defendant, because of a severe mental disease or defect, was unable to appreciate the nature and quality of the wrongfulness of his acts. *See* 18 U.S.C. § 17.

5. Pursuant to Rule 12.2(b) of the Federal Rules of Criminal Procedure, the defense hereby notifies the government of its intention to introduce expert evidence relating to a mental disease or defect or any other mental condition bearing on the issue of guilt.

DATED: September 14, 2024
Buffalo, New York

Respectfully submitted,

/s/Jeffrey T. Bagley

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